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Attorneys for Defendant
INDIAN HARBOR INSURANCE COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IGNACIO PEREZ,

Plaintiff,

V.

INDIAN HARBOR INSURANCE COMPANY,
and DOES 1 through 50, inclusive,

Defendants.

Case No. 4:19-cv-07288-YGR

**ORDER GRANTING STIPULATION
NO. 3: TO EXTEND EXPERT
DISCOVERY DEADLINE BY ONE
WEEK**

Judge: Hon. Yvonne Gonzalez Rogers
Complaint Filed: November 5, 2019

1 Plaintiff Ignacio Perez (“Plaintiff”) and Defendant Indian Harbor Insurance Company
2 (“Defendant”) (collectively, the “parties”), by and through their counsel, hereby stipulate as
3 follows:

4 WHEREAS, on August 31, 2020, the Court set an April 7, 2021 deadline for completion of
5 non-expert discovery, a May 7, 2021 deadline for opening expert reports, a June 7, 2021 deadline
6 for rebuttal expert reports, and a July 9, 2021 deadline for completion of expert discovery (ECF
7 No. 67);

8 WHEREAS, on April 9, 2021, the Court granted the parties’ Stipulation No. 2, which set an
9 April 28, 2021 deadline for the completion of certain depositions, and moved the expert report
10 deadlines by one week to May 14, 2021 (opening reports) and June 14, 2021 (rebuttal reports)
11 (ECF No. 83);

12 WHEREAS, the parties timely disclosed experts on May 14, 2021 and June 14, 2021, and
13 disclosed a total of seven expert witnesses; and

14 WHEREAS, the parties have been diligently pursuing scheduling these seven experts for
15 depositions by July 9, 2021 and have agreed to conduct five of them prior to July 9, 2021, but
16 based on the witnesses’ and attorneys’ schedules, they require an additional week to conduct two of
17 the depositions.

18 NOW THEREFORE, the parties respectfully request that the Court continue the deadline
19 for completion of expert discovery from July 9, 2021 to July 16, 2021 for the purposes of
20 conducting two expert depositions. All other remaining deadlines set forth in the Court’s August
21 31, 2020 Case Management and Pretrial Order shall remain the same, and no deadline to lodge or
22 file any matter with the Court shall be changed.

IT IS SO STIPULATED, through Counsel of Record.

Dated: June 18, 2021

DUANE MORRIS LLP

By: /s/ Max. H. Stern
Max H. Stern

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Dated: June 18, 2021

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2 **ATTESTATION**

3 I, Max H. Stern, am the ECF User whose identification and password are being used to file
4 Stipulation No. 3: To Extend Expert Discovery Deadline by One Week, filed concurrently
5 herewith. Pursuant to Local Rule 5-1(i)(3), I hereby attest that counsel for Plaintiff Ignacio Perez
6 has concurred in the filing of the Stipulation No. 3: To Extend Expert Discovery Deadline by One
7 Week, filed concurrently herewith.

8
9 Dated: June 18, 2021

DUANE MORRIS LLP

10 By: /s/ Max H. Stern
11 Max H. Stern

12
13 **IT IS ORDERED** that the forgoing Stipulated Order is approved and entered as an Order
14 of the Court.

15 Dated: June 24, 2021


16 UNITED STATES DISTRICT JUDGE
17 YVONNE GONZALEZ ROGERS

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